

1 Jorge Alejandro Rojas  
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3 Plaintiff in Pro Se  
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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,  
Plaintiff,  
v.  
PIONEER CREDIT SOLUTIONS LLC,  
Defendant.

Case No. 2:23-cv-08433-SB-E

**RESPONSE TO ORDER TO SHOW  
CAUSE RE DISMISSAL FOR  
IMPROPER VENUE (DKT. 12)**

Plaintiff, Jorge Alejandro Rojas, respectfully responds to the Court's October 20, 2023 Order to Show Cause Re Dismissal for Improper Venue (Dkt. 12).

The Court is correct that Plaintiff was not within this District when he received the texts. Plaintiff understands that the Court is concerned regarding the only connection to venue being Plaintiff's area code being "in district." However, during one of the telephone calls alleged in the Complaint as being made in violation of the Telephone Consumer Protection Act ("TCPA"), the caller stated to Plaintiff that the address he had "on file" was Plaintiff's prior Torrance, California, in district address. Dkt. 1 ¶ 30. Plaintiff believes that this shows that the Defendants were directing their conduct within this District.

1        Additionally, Plaintiff subsequently received a telephone call on October 3, 2023,  
2 and a series of text messages from an in district telephone number, area code 213, regarding  
3 the same services which are at issue in the Complaint. Dkt. 1 ¶¶ 33-34.

4        Plaintiff believes that based on the above, the Defendants were making telephone  
5 calls which targeted residents of this District, and that the follow up call from “Maria” on  
6 October 3, 2023, from a 213 area code, supports this as well.

7        To the extent that the Court finds that this is inadequate to demonstrate venue,  
8 Plaintiff respectfully requests the Court transfer the case to the Southern District of  
9 California – as Defendants list an address located in San Diego, CA on their website – or  
10 to the District of Delaware (where Defendants are incorporated). Plaintiff respectfully  
11 requests the Court not dismiss this action – and that it defer rulling on the order to show  
12 cause until after defendants appear, transfer the action, or permit Plaintiff to file a motion  
13 to transfer.

14        Respectfully submitted,

15        Dated: October 27, 2023

16        /s/ Jorge Alejandro Rojas

17        Jorge Alejandro Rojas  
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20        **CERTIFICATE OF SERVICE**

21        Plaintiff will mail this document to Defendant’s registered agent via USPS First  
22 Class Mail.

23        Dated: October 27, 2023

24        /s/ Jorge Alejandro Rojas

25        Jorge Alejandro Rojas